

Seattle City Light

M. J. Macdonald, Acting Superintendent
Norman B. Rice, Mayor

May 29, 1992

RECEIVED

JUN 2 1992



FCC MAIL BRANCH

RECEIVED
JUN 2 1992

RECEIVED

JUN - 2 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms. Searcy:

Notice of Proposed Rule Making Docket No. 92-9

On January 3, 1992 Seattle City Light responded to PCS Inquiry - Gen Docket 90-314. In that response we were opposed to the reallocation of spectrum in the 1850-2200 MHz band. Seattle City Light hereby submits its comments regarding the Notice of Proposed Rule Making Docket No. 92-9.

Seattle City Light is a municipal power utility, owned, operated, and regulated by the City of Seattle. Seattle City Light serves over 669,000 residents in a 131 square mile area, including the City and some adjacent areas of King County.

Seattle City Light currently operates 11 microwave links operating in the 1850-2200 MHz band. We are foreseeing the installation of two additional microwave hops within the city limits. The microwave frequency to be used is undetermined at this time.

Seattle City Light opposes a reallocation of spectrum in the 1850-2200 MHz band for the development of Personal Communications Networks (PCN) for the following reasons:

1. Expense

We estimate that it would cost approximately \$2.5 million to remove and replace our existing 11 microwave links.

RECEIVED

JUN 2 1992

2. No Guarantee of Another Operating Frequency

FCC MAIL BRANCH

In order to install replacement microwave equipment, a frequency coordination study must be performed in order to determine the frequency to be used that would not cause interference to other users. At this time, there is no guarantee that there are other microwave frequencies available for the areas in which we currently operate.

3. Loss of Reliability

If we are forced to vacate the 1850-2200 MHz band, then we would likely use a 6-GHz or higher band. Some of our existing 2-GHz microwave links are in excess of 70 miles. Microwave transmission and reception operating in the 6-GHz or higher bands for this distance will not be able to provide the same reliability as 2-GHz band transmission and reception. Weather and other natural obstacles cause more microwave communications path fades using 6 GHz or higher than using 2 GHz.

Seattle City Light uses microwave radio to control generation and to provide dam failure alarming, emergency communications, and other services which provide safety to the general public. Therefore, it is imperative that the communications paths and operating frequencies be the most reliable possible, since failure of such communications medium could jeopardize human life.

Seattle City Light understands that certain proponents of PCN are claiming that PCN can share the fixed microwave bands through the use of spread spectrum or other techniques. Seattle City Light is skeptical of these claims and urges the FCC to review these claims carefully before authorizing PCN on a band-sharing basis. Seattle City Light depends heavily on its microwave communications, and any disruption or interference could not be tolerated for the reasons stated above.

In no event should a fixed microwave user be forced to relocate from the 1850-2200 MHz band until:

Donna R. Searcy
Page 3
May 29, 1992

RECEIVED

JUN 2 1992

1. There is adequate replacement spectrum made available in close proximity to the 1850-2200 MHz band. FCC MAIL BRANCH
2. Adequate time is allowed to construct replacement facilities.
3. The cost for any relocation is paid for by the PCN licensee. Any compensation for the relocation of existing users should be arrived at through negotiations between the existing user and the PCN licensee.

Very truly yours,



M. J. Macdonald, Acting Superintendent
Seattle City Light

MDL:mdl